

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ZAPFRAUD, INC., )  
                        )  
Plaintiff,           )  
                        )  
v.                     ) C.A. No. 19-1691-MN  
                        )  
PROOFPOINT, INC., )  
                        )  
Defendant.           )

**MOTION AND PROPOSED ORDER FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves for the admission *pro hac vice* of Katherine Vidal, Michael R. Rueckheim, and William M. Logan, of Winston & Strawn LLP, 275 Middlefield Road, Suite 205, Menlo Park, CA 94025, to represent defendant Proofpoint, Inc., in this matter.

/s/ Karen E. Keller

Karen E. Keller (No. 4489)  
David M. Fry (No. 5486)  
Nathan R. Hoeschen (No. 6232)  
SHAW KELLER LLP  
I.M. Pei Building  
1105 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 298-0700  
kkeller@shawkeller.com  
dfry@shawkeller.com  
nhoeschen@shawkeller.com  
*Attorneys for Defendant*

OF COUNSEL:  
Katherine Vidal  
Michael R. Rueckheim  
William M. Logan  
WINSTON & STRAWN LLP  
275 Middlefield Road, Suite 205  
Menlo Park, CA 94025  
(650) 858-6425

Dated: October 7, 2019

**[PROPOSED] ORDER GRANTING MOTION**

IT IS HEREBY ORDERED that counsel's motion for the admission *pro hac vice* of Katherine Vidal, Michael R. Rueckheim, and William M. Logan is granted.

---

United States District Judge

Date: \_\_\_\_\_

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar(s) of CA, TX and NY, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 3/25/14, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.



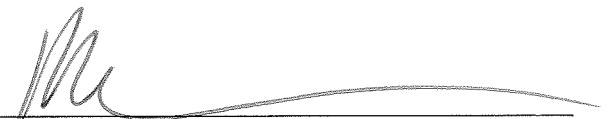
---

Michael R. Rueckheim  
WINSTON & STRAWN LLP  
275 Middlefield Road, Suite 205  
Menlo Park, CA 94025  
(650) 858-6425  
MRueckheim@winston.com

Dated: October 2, 2019

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar(s) of CA and AZ, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 3/25/14, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.



Katherine Vidal  
WINSTON & STRAWN LLP  
275 Middlefield Road, Suite 205  
Menlo Park, CA 94025  
(650) 858-6425  
KVidal@winston.com

Dated: October 2, 2019

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar(s) of Texas, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 3/25/14, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

  
\_\_\_\_\_  
William M. Logan  
WINSTON & STRAWN LLP  
1111 Louisiana Street  
Houston, TX 77002  
(713) 651-27636  
WLogan@winston.com

Dated: October 2, 2019